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4 **UNITED STATES DISTRICT COURT**
5 **NORTHERN DISTRICT OF CALIFORNIA**
6 **OAKLAND DIVISION**

7
8 IN RE CALIFORNIA BAIL BOND
9 ANTITRUST LITIGATION

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11 THIS DOCUMENT RELATES TO:
12 ALL ACTIONS

Master Docket No. 19-cv-00717-JST-DMR

CLASS ACTION

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**STIPULATION AND [PROPOSED]
ORDER RE: EXTENSION TO FILE
THIRD CONSOLIDATED AMENDED
COMPLAINT**

Pursuant to Civil Local Rule 6-2, all Plaintiffs and Defendants (the “Parties”) in the above-entitled action stipulate as follows:

WHEREAS, the Court ordered the Parties to proceed with discovery on December 10, 2020, with Dismissed Defendants¹ to submit pre-amendment discovery focused on deficiencies the Court identified in Plaintiffs’ Second Amended Complaint (ECF No. 151);

WHEREAS, the Court referred the management of discovery in this case, “including the issues set forth in the [P]arties’ joint case management statement, ECF No. 173,” to Magistrate Judge Ryu on January 25, 2021 (ECF No. 175);

WHEREAS, the deadline for Plaintiffs to file their Third Consolidated Amended Complaint (“TCAC”) is October 11, 2021 (ECF No. 199);

WHEREAS, on August 12, 2021, Plaintiffs and Dismissed Defendants submitted to Judge Ryu a dispute regarding the proper geographic scope of pre-amendment discovery based on certain search terms and custodians (ECF No. 208);

WHEREAS, on September 30, 2021, Judge Ryu set a deadline of November 29, 2021 for Dismissed Defendants to produce all responsive documents regardless of geography, except documents that pertain solely to individual bail bond transactions outside California (ECF No. 230);

WHEREAS, the Parties have agreed to extend the deadline for Plaintiffs to file their TCAC by an additional 40 days beyond the November 29, 2021 deadline without prejudice to any Party seeking a further extension;

¹ For the avoidance of doubt, the Dismissed Defendants are Allegheny Casualty Company, International Fidelity Insurance Company, AIA Holdings, Inc., American Contractors Indemnity Company, Bankers Insurance Company, Accredited Surety and Casualty Company, Inc., Lexington National Insurance Company, Seneca Insurance Company, Continental Heritage Insurance Company, Seaview Insurance Company, Danielson National Insurance Company, Financial Casualty & Surety, Inc., Indiana Lumbermens Mutual Insurance Company, Lexon Insurance Company, North River Insurance Company, Philadelphia Reinsurance Corporation, Sun Surety Insurance Company, United States Fire Insurance Company, Universal Fire & Casualty Company, Williamsburg National Insurance Company, California Bail Agents Association, Golden State Bail Agents Association, American Bail Coalition, Inc., Two Jinn, Inc., All-Pro Bail Bonds Inc., and Jerry Watson.

1 **WHEREAS**, the Court has set no further deadlines in this matter, and therefore none
2 would be affected;

3 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by and
4 between the Parties that Plaintiffs shall have until January 10, 2022 to file their TCAC without
5 prejudice to any Party seeking to further extend that deadline.

6 Dated: October 7, 2021

By: /s/ Adam Gitlin

7 Dean M. Harvey (SBN 250298)
8 Katherine Lubin (SBN 259826)
9 Yaman Salahi (SBN 288752)
Adam Gitlin (SBN 317047)
Nigar A. Shaikh (*pro hac vice*)
10 Miriam E. Marks (SBN 332351)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
11 San Francisco, CA 94111
Telephone: (415) 956-1000
12 dharvey@lchb.com
kbenson@lchb.com
13 ysalahi@lchb.com
agitlin@lchb.com
14 nshaikh@lchb.com
mmarks@lchb.com

15 *Interim Class Counsel*

16
17 Dated: October 7, 2021

COOLEY LLP
18 MICHAEL A. ATTANASIO (151529)
BEATRIZ MEJIA (190948)
19 TIMOTHY W. COOK (*PRO HAC VICE*)
MAX SLADEK DE LA CAL (324961)

20 By: /s/ Beatriz Mejia

21 Beatriz Mejia (190948)

22 *Attorneys for Defendants Seaview Insurance*
23 *Company and Two Jinn, Inc.*

1 Dated: October 7, 2021

By: /s/ Julie A. Gryce

2 Julie A. Gryce (319530)
3 DLA Piper LLP (US)
4 401 B Street, Suite 1700
5 San Diego, CA 92101-4297
6 Telephone: (619) 699-2700
7 Facsimile: (619) 699-2701
8 julie.gryce@dlapiper.com

9 Michael P. Murphy (*pro hac vice*)
10 DLA PIPER LLP (US)
11 1251 Avenue of the Americas
12 New York, NY 10020-1104
13 Telephone: (212) 335-4500
14 Facsimile: (212) 335-4501
15 michael.murphy@dlapiper.com

16 John Hamill
17 DLA Piper LLP (US)
18 444 West Lake Street, Suite 900
19 Chicago, IL 60606-0089
20 Telephone: 312.368.7036
21 Facsimile: 312.251.5809
22 John.hamill@us.dlapiper.com

23 *Attorneys for Defendants Danielson*
24 *National Insurance Company*

25 Dated: October 7, 2021

By: /s/ Drew Koning

26 Drew Koning (263082)
27 Blake Zollar (268913)
28 Shaun Paisley (244377)
KONING ZOLLAR LLP
2210 Encinitas Blvd., Suite S
Encinitas, CA 92024
Telephone: (858) 252-3234
Facsimile: (858) 252-3238
drew@kzllp.com
blake@kzllp.com
shaun@kzllp.com

Attorneys for Defendant All-Pro Bail
Bonds, Inc.

1 Dated: October 7, 2021

By: /s/ Gerard G. Pecht

2 Gerard G. Pecht (*pro hac vice*)
3 NORTON ROSE FULBRIGHT US LLP
4 1301 McKinney, Suite 5100
Houston, Texas 77010
5 Telephone: (713) 651-5151
6 Facsimile: (713) 651-5246
gerard.pecht@nortonrosefulbright.com

7 Joshua D. Lichtman (SBN 176143)
8 NORTON ROSE FULBRIGHT US LLP
555 South Flower Street, Forty-First Floor
9 Los Angeles, California 90071
Telephone: (213) 892-9200
10 Facsimile: (213) 892-9494
joshua.lichtman@nortonrosefulbright.com

11 *Attorneys for Defendant American*
12 *Contractors Indemnity Company*

13 Dated: October 7, 2021

By: /s/ Anne K. Edwards

14 Anne K. Edwards (110424)
15 SMITH, GAMBRELL & RUSSELL, LLP
444 South Flower Street, Suite 1700
16 Los Angeles, CA 90071
Telephone: (213) 358-7210
17 Facsimile: (213) 358-7310
aedwards@sgrlaw.com

18 *Attorneys for Defendant Williamsburg*
19 *National Insurance Company*

20 Dated: October 7, 2021

By: /s/ Enrique Martinez

21
22 Todd A. Roberts
Enrique Martinez
23 ROPERS MAJESKI, PC

24 *Attorneys for Defendants American Bail*
25 *Coalition, Inc. and William B. Carmichael*
26
27
28

1 Dated: October 7, 2021

By: /s/ David F. Hauge

2 David F. Hauge (128294)
3 Todd H. Stitt (179694)
4 Vincent S. Loh (238410)
MICHELMAN & ROBINSON, LLP

5 *Attorneys for Defendants United States*
6 *Fire Insurance Company, The North River*
7 *Insurance Company, and Seneca*
Insurance Company

8 Dated: October 7, 2021

By: /s/ Christie A. Moore

9 Renee Choy Ohlendorf
10 Hinshaw & Culbertson LLP
11 One California Street, 18th Floor
12 San Francisco, CA 94111
13 Main: (415) 362-6000
14 Direct: (415) 393-0122
RChoy@hinshawlaw.com

15 Christie A. Moore (*pro hac vice*)
16 W. Scott Croft (*pro hac vice*)
17 BINGHAM GREENEBAUM DOLL LLP
18 101 S. Fifth Street
3500 PNC Tower
Louisville, KY 40202
Telephone: 502.587.3758
Facsimile: 502.540.2276
cmoore@bgdlegal.com
wcroft@bgdlegal.com

19 *Attorneys for Lexon Insurance Company*

20
21 Dated: October 7, 2021

By: /s/ Travis Wall

22 Travis Wall (191662)
23 Spencer Kook (205304)
24 HINSHAW & CULBERTSON LLP
25 One California Street, 18th Floor
26 San Francisco, CA 94111
Tel: (415) 362-6000
twall@hinshawlaw.com

27 *Attorneys for Defendant Philadelphia*
28 *Reinsurance Corporation*

1 Dated: October 7, 2021

By: /s/ Gregory S. Day

2 Gregory S. Day
3 LAW OFFICES OF GREGORY S. DAY
4 120 Birmingham Drive, Suite 200
5 Cardiff, CA 92007
6 Telephone: (760) 436-2827
7 attygsd@gmail.com

8 *Attorneys for Defendants California Bail
9 Agents Association, Universal Fire &
10 Insurance Company, Sun Surety Insurance
11 Company*

12 Dated: October 7, 2021

By: /s/ John A. Sebastinelli

13 John A. Sebastinelli (127859)
14 Howard Holderness (169814)
15 GREENBERG TRAURIG, LLP
16 4 Embarcadero Ctr, Ste. 3000
17 San Francisco, CA 94111-5983
18 Telephone: (415) 655-1289
19 Facsimile: (415) 358-4796
20 sebastinellij@gtlaw.com
21 holdernessh@gtlaw.com

22 *Attorneys for Defendants American Surety
23 Company and Indiana Lumbermens
24 Mutual Insurance Company*

25 Dated: October 7, 2021

By: /s/ Gary A. Nye

26 Gary A. Nye (126104)
27 ROXBOROUGH, POMERANCE, NYE &
28 ADREANI, LLP

*Attorneys for Defendants Allegheny
Casualty Company, Associated Bond and
Insurance Agency, Inc., Bankers
Insurance Company, Harco National
Insurance Company, International
Fidelity Insurance Company, Lexington
National Insurance Corporation, and
Jerry Watson*

1 Dated: October 7, 2021

By: /s/ Brendan Pegg

2 Brendan Pegg (174159)
3 Lindsay Cooper-Greene, of Counsel
(295180)
4 LAW OFFICES OF BRENDAN PEGG
201 E. Ojai Avenue #1505
5 Ojai, CA93024
Telephone: (805) 3024151
6 Facsimile: (877) 719-7298
7 brendan@bpegglaw.com

8 *Attorneys for Defendant Financial*
9 *Casualty & Surety, Inc.*

10 Dated: October 7, 2021

By: /s/ Erik K. Swanholt

11 Erik K. Swanholt
12 FOLEY & LARDNER
555 South Flower St., 33rd Floor
13 Los Angeles, CA 90071
Telephone: (213) 972-4500
14 Facsimile: (213) 486-0065

15 *Attorneys for Defendants Continental*
16 *Heritage Insurance Company*

17 Dated: October 7, 2021

By: /s/ John M. Rorabaugh

18 John M. Rorabaugh (178366)

19 *Attorney for Defendant Golden State Bail*
20 *Association*

21 Dated: October 7, 2021

By: /s/ Paul J. Riehle

22 Paul J. Riehle (115199)
23 FAEGRE DRINKER BIDDLE & REATH LLP
4 Embarcadero Center, 27th Floor
24 San Francisco, California 94111
Telephone: (415) 551-7521
25 Facsimile: (415) 551-7510
paul.riehle@faegredrinker.com

26 *Attorneys for Defendant Accredited Surety*
27 *and Casualty Company, Inc.*

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that Plaintiffs shall have until January 10, 2022 to file their TCAC without prejudice to any Party seeking to further extend that deadline.

Dated: October __, 2021

THE HONORABLE JON S. TIGAR
UNITED STATES DISTRICT JUDGE

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Adam Gitlin, attest that the concurrence in the filing of this document has been obtained from the other signatories. Executed on October 7, 2021, in Oakland, California.

/s/ Adam Gitlin

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